



IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA

v.

Case No. 1:19-cr-183

HAROON K. ULLAH,

Defendant.

CRIMINAL INFORMATION

COUNT 1

Theft of Government Money and Property  
(18 U.S.C. § 641)

THE UNITED STATES ATTORNEY CHARGES THAT

1. From in or around February 2018 and continuing through in or around October 2018, the defendant, HAROON K. ULLAH, in the Eastern District of Virginia and elsewhere, did willfully and knowingly and without lawful authority, steal, purloin and convert over \$1,000 in money and other things of value from the United States Agency for Global Media, a federal agency of the United States, knowing that the money and things of value belonged to the United States, and intending to permanently deprive the United States of the money and things of value.

(In violation of Title 18, United States Code, Section 641.)

**FORFEITURE NOTICE**

**THE UNITED STATES ATTORNEY FURTHER ALLEGES FORFEITURE OF  
PROPERTY AS DESCRIBED HEREIN**

1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Sections 982(a) in the event of the defendant's conviction on the bank fraud count contained in Count 1 of this Information.

2. Upon conviction of Count 1, Theft of Government Money, the convicted defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property constituting or derived from proceeds obtained directly or indirectly, as the result of such violation.

3. Substitute Assets: Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), the convicted defendant shall forfeit to the United States any other property, real or personal, up to the value of the property described above, if by any act or omission of the defendant(s), the property subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty.

4. Money Judgment: the United States will seek a forfeiture money judgment against the convicted defendant in an amount as is proved at trial or sentencing in this matter

representing the total amount of proceeds obtained as a result of the defendant's offense(s) or involved in such offenses, which will be at least \$37,082.49 in United States currency.

(In accordance with Title 18, United States Code, Section 981(a)(1)(C), 28 U.S.C. 2461(c) and Rule 32.2(a), Federal Rules of Criminal Procedure.)

Respectfully submitted,

G. Zachary Terwilliger  
United States Attorney

Date: June 13, 2019

By:

  
Russell L. Carlberg  
Special Assistant United States Attorney LT